ORIGINAL

Before the
Federal Communications Commission
Washington, D.C. 20554

In re Applications of	)	
	)	MM Docket No. 86-440
Achernar Broadcasting Company	)	
	)	File No. BPCT-860410KP
Lindsay Television	)	
	)	File No. BPCT-860410KQ
For Construction Permit For a New UHF TV Station on Channel 64 at Charlottesville, Virginia	)	
To: The Commission	)	

SUPPLEMENT TO SHENANDOAH VALLEY EDUCATIONAL TELEVISION CORPORATION'S COMMENTS IN OPPOSITION

Shenandoah Valley Educational Television Corporation ("SVETC") submits this supplement to its comments in the above-captioned matter[1], in response to the actions contemplated by the Commission's Order, released June 28, 1999[2] and the public notice issued by the Mass Media Bureau on November 22, 1999.[3] The Order requested comments on, among other issues, whether to grant the proposal of a merged entity, Charlottesville Broadcasting

[1] See SVETC Comments, MM Docket No. 86-440, filed July 28, 1999; and SVETC Reply Comments, MM Docket No. 86-440, filed August 19, 1999.

[2] See Order, FCC 99I-15, released June 28, 1999 (hereinafter, "Order"), at ¶ 4.

[3] See Public Notice, Mass Media Bureau Announces Window Filing Opportunity for Certain Pending Applications and Allotment Petitions for New Analog TV Stations, DA 99-2605, released November 22, 1999 (hereinafter "Notice").

Corporation ("CBC"), to add channel 19 at Charlottesville, Virginia, to the Table of Allotments (47 C.F.R. 73.606) and to amend CBC's pending application for channel 64 to request, in the alternative, either channel 64 or channel 19. SVETC has already registered its strong objections to the proposal to grant channel 19 to CBC in contravention of the Commission's rules and the public interest. The recently issued Notice suggests that the Commission may consider setting aside its proscribed procedures for allotting channel 19 to Charlottesville, and SVETC believes that fundamental fairness and the public interest require competitive consideration of SVETC's application to operate a noncommercial educational station on channel 19 at Charlottesville at the same time as any application for channel 19 receives consideration. Accordingly, SVETC has attached as Exhibit A to this pleading an application for a new noncommercial educational station on channel 19 in Charlottesville, Virginia, and has contemporaneously submitted the application to the Secretary of the Commission.

SVETC believes that this application is appropriate at this time as the Notice issued states that CBC, unlike all other similarly situated applicants, will not be required to submit a petition for rulemaking to amend its application to channel 19.[4] SVETC submits that if channel 19 is allotted to Charlottesville, the Commission must consider SVETC's competing equities and its competing application for that channel.[5] SVETC has long provided valuable, noncommercial, educational program to the Charlottesville area. Since its inception in 1964,

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[4] See Notice at n.9. SVETC continues to strongly oppose the waiving of nearly all relevant Commission procedures in this matter. See also SVETC Comments and SVETC Reply Comments. Further, SVETC believes that the change in circumstances indicated by the Notice provides ample cause for acceptance of this pleading and consideration of the application, pursuant to Section 1.41 of the Commissions Rules.

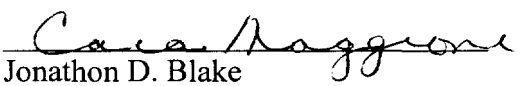
[5] Section 309 of the Communications Act of 1934, as amended, for example clearly establishes that the procedures for assigning such channels must be competitive proceedings, and merely handing CBC the new channel without affording others the same opportunity directly violates this mandate. SVETC should be allowed to apply for the channel via a proper assignment procedure that best serves the community's needs.

SVETC's service has included award-winning local and regional programming, as well as a full schedule of over-the-air educational programs, and in-school programming to the schools within its service area. For several years SVETC has aggressively pursued options to preserve its Charlottesville service (*e.g.*, upgrading its translator to a full power station), but was unable to do so given its location within a designated "freeze" area. CBC's amended yet still deficient application, however, threatens to remove the possibility of such upgraded service. If at this time the Commission is prepared to allot channel 19 to the Charlottesville area in the above-captioned proceeding, SVETC strongly urges allotting the channel as a reserved channel for noncommercial use or at a minimum that the Commission consider its competitive application simultaneously with the above-captioned proceeding.[6] The Commission must recognize the extraordinary equities and public interest that dictate allowing simultaneous consideration of SVETC's application to maintain its longstanding service to this community.

[6] Further, the Commission stated in the Notice that petitioners with applications pending for channels 60 to 69, who are required to submit rule making petitions for new channels – such petitioners encompassing all similarly situated applicants to CBC – "should consider, to the extent possible, authorized LPTV and TV translator stations." Notice at 5. The proceedings to date indicate no such consideration of the valuable service provided by SVETC on its existing translator.

SVETC respectfully requests, if channel 19 is allotted to Charlottesville, consideration of its application for channel 19 in Charlottesville, Virginia at the same time as the application in the above-captioned proceeding.

Respectfully submitted,



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(202) 662-6000

Counsel for Shenandoah Valley Educational Television Corporation

December 2, 1999

CERTIFICATE OF SERVICE

I, Cara Maggioni, hereby certify that a true and correct copy of the foregoing Supplement was this December 2, 1999 sent by first-class mail, postage prepaid to the following:

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Mass Media Bureau
Federal Communications Commission
2025 M Street, N.W., Suite 8210
Washington, D.C. 20554

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Cara Maggioni

EXHIBIT A

Federal Communications Commission
Washington, D. C. 20554

Approved by OMB
3060-0034
Expires 11/30/97

FCC 340

APPLICATION FOR CONSTRUCTION PERMIT FOR NONCOMMERCIAL EDUCATIONAL BROADCAST STATION

(Carefully read instructions before filing form) Return only form to FCC

FOR COMMISSION USE ONLY
FILE NO.

Section I - GENERAL INFORMATION

1. Name of Applicant		
Shenandoah Valley Educational Television Corporation		
Street Address or P.O. Box 298 Port Republic Road		
City Harrisonburg	State VA	ZIP Code 22801
Telephone Number *(include Area Code)* 540 434-5391		

Send notices and communications to the following person at the address below:		
Name Maurice J. Bresnahan		
Street Address or P.O. Box 298 Port Republic Road		
City Harrisonburg	State VA	ZIP Code 22801
Telephone Number *(include Area Code)* 540/434-5391		

2. This application is for: ☐ AM ☐ FM ☒ TV

(a) Channel No. or Frequency	(b) Principal Community	City	State
19		Charlottesville	VA

(c) Check one of the following boxes:

☒ Application for NEW station

☐ MAJOR change in licensed facilities; call sign: _____ _____

☐ MINOR change in licensed facilities; call sign: _____ _____

☐ MAJOR modification of construction permit; call sign: _____ _____

File No. of construction permit; call sign: _____ _____

☐ MINOR modification of construction permit; call sign: _____ _____

File No. of construction permit; call sign: _____ _____

☐ AMENDMENT to pending application: Application File Number: _____ _____

NOTE: It is not necessary to use this form to amend a previously filed application. Should you do so, however, please submit only Section I and those other portions of the form that contain the amended information.

3. Is this application mutually exclusive with a renewal application? ☐ Yes ☒ No

If Yes, state:

Call letters	Community of License	
	City	State

February 1992 edition useable.

Section II - LEGAL QUALIFICATIONS

Name of Applicant

1. Applicant is: (check one box below)

☐ (a) governmental or public educational agency, board or institution

☐ (b) private nonprofit educational institution

☒ (c) nonprofit educational corporation

☐ (d) other (specify)

2. For applicants 1(c) or (d), describe in an Exhibit the nature and educational purposes of the applicant. Exhibit No. A

3. For applicants 1(c) or 1(d) applying for a new noncommercial educational television station only, describe in an Exhibit how the applicant's officers, directors and members of its governing board are broadly representative of the educational, cultural and civic segments of the principal community to be served. Exhibit No. B

4. Describe in an Exhibit how the proposed station will be used, in accordance with 47 C.F.R. Section 73.503 or Section 73.621, for the advancement of an educational program. Exhibit No. C

5. Is there any provision contained in any by-laws, articles of incorporation, partnership agreement, charter, statute or other document which would restrict the applicant in advancing an educational program or complying with any Commission rule, policy or provision of the Communications Act of 1934, as amended? ☐ Yes ☒ No

If Yes, provide particulars in an Exhibit. Exhibit No.

CITIZENSHIP AND OTHER STATUTORY REQUIREMENTS

6. (a) Is the applicant in violation of the provisions of Section 310 of the Communications Act of 1934, as amended, relating to interests of aliens and foreign governments? (See Instruction B to Section II.) ☐ Yes ☒ No

(b) Will any funds, credits or other financial assistance for the construction, purchase or operation of the station(s) be provided by aliens, foreign entities, domestic entities controlled by aliens, or their agents? ☐ Yes ☒ No

If the answer to (b) above is Yes, attach an Exhibit giving full disclosure concerning this assistance. Exhibit No.

7. Has an adverse finding been made or an adverse final action been taken by any court or administrative body as to the applicant, any party to this application, or any non-party equity owner in the applicant, in a civil or criminal proceeding brought under the provisions of any law related to the following: any felony; mass media related antitrust or unfair competition; fraudulent statements to another governmental unit; or discrimination? ☐ Yes ☒ No

If the answer is Yes, attach as an Exhibit a full disclosure concerning the persons and matters involved, including an identification of the court or administrative body and the proceeding (by dates and file numbers), and a description of the disposition of the matter. Where the requisite information has been earlier disclosed in connection with another application or as required by 47 C.F.R. Section 1.65, the applicant need only provide: (i) an identification of that previous submission by reference to the file number in the case of an application, the call letters of the station regarding which the application or Section 1.65 information was filed, and the date of filing; and (ii) the disposition of the previously reported matter. Exhibit No.

PARTIES TO THE APPLICATION

8. Complete the following Table with respect to all parties to this application.

(NOTE: If the applicant considers that to furnish complete information would pose an unreasonable burden, it may request that the Commission waive the strict terms of this requirement with appropriate justification.

INSTRUCTIONS: **If applicant is a corporation or an unincorporated association with 50 or fewer stockholders, stock subscribers, holders of membership certificates or other ownership interests,** fill out all columns, giving the information requested as to all officers, directors and members of governing board. In addition, give the information as to all persons or entities who are the beneficial or record owners of or have the right to vote capital stock, membership ownership interests or are subscribers to such interest. **If the applicant has more than 50 stockholders, stock subscribers or holders of membership certificates or other ownership interests,** furnish the information as to officers, directors, members of governing board, and all persons or entities who are the beneficial or record owners of or have the right to vote 1% or more of the capital stock, membership or ownership interests. **If applicant is a governmental or public educational agency, board or institution,** fill out columns (a), (b), and (c) as to all members of the governing board and chief executive officers.

Name and Residence Address(es) (a)	Office Held (b)	Director or Member of Governing Board (c)		% of: Ownership (O) or Voting Stock(VS) or Membership (M) (d)
		Yes	No	
See Exhibit D				

Section II - LEGAL QUALIFICATIONS (Page 4)

9. Does the applicant, or any party to the application, have a petition to migrate to the expanded band (1605-1705 (kHz)) or a permit or license either in the existing band or expanded band that is held in combination with the AM facility proposed to be modified herein? ☐ Yes ☒ No

If Yes, provide particulars as an Exhibit. Exhibit No.

10. Does the applicant or any party to the application have, or have they had, any interest in:

(a) a broadcast station, or pending broadcast station application before the Commission? ☐ Yes ☒ No

(b) a broadcast application which has been dismissed with prejudice by the Commission? ☒ Yes ☐ No

(c) a broadcast application which has been denied by the Commission? ☐ Yes ☒ No

(d) a broadcast station, the license of which has been revoked? ☐ Yes ☒ No

(e) a broadcast application in any pending or concluded Commission proceeding which left unresolved character issues against the applicant? ☐ Yes ☒ No

If the answer to any of the questions in (a)-(e) above is Yes, state in an Exhibit the following information: Exhibit No. E

(1) Name of party having interest;
(2) Nature of interest or connection, giving dates;
(3) Call letters of stations or file number of application or docket; and
(4) Location.

SECTION III - FINANCIAL QUALIFICATIONS

NOTE: If this application is for a change in an operating facility DO NOT fill out this Section.

1. Is this application contingent upon receipt of a grant from the National Telecommunications and Information Administration? ☐ Yes ☒ No

2. Is this application contingent upon receipt of a grant from a charitable organization, the approval of the budget of a school or university, or an appropriation from a state, county, municipality or other political subdivision? ☐ Yes ☒ No

NOTE: If either Questions 1 or 2 is answered "Yes," your application cannot be granted until all of the necessary funds are committed or appropriated. In the case of grants from the National Telecommunications and Information Administration, no further action on your part is required. If you rely on funds from a source specified in Question 2, **you must advise the F.C.C. when the funds are committed or appropriated.** This should be accomplished by letter amendment to your application, in triplicate, signed in the same manner as the original application, and clearly identifying the application to be amended.

3. The applicant certifies that sufficient net liquid assets are on hand or that sufficient funds are available from committed sources to construct and operate the requested facilities for three months without revenue. ☒ Yes ☐ No

SECTION IV - PROGRAM SERVICE STATEMENT

Attach as an Exhibit, a brief description, in narrative form, of the planned programming service relating to the issues of public concerning facing the proposed service area. Exhibit No.

NOTE: No program service statement need be filed where the proposed station's programming would be **wholly** "instructional" as that type of programming is defined in the instructions to this Section.

Exhibit A

Since it first signed-on in 1968, Shenandoah Valley Educational Television Corporation ("WVPT") has been one of the most accessible educational institutions in the Shenandoah Valley and Piedmont region, utilizing the power of broadcasting to help carry out its mission to provide lifelong learning opportunities to everyone within its reach. While the most visible activity of WVPT is the broadcast of quality noncommercial, educational PBS programming, the station's efforts extend beyond the TV screen and into the community through outreach services and local programming.

WVPT is on the air 18 hours every day with noncommercial, high-quality programming designed to teach, illuminate, entertain and inspire. WVPT serves the Shenandoah Valley and Piedmont region with transmitters in Staunton and Front Royal, and five additional translators to fill in the signal where it is shaded by mountains and valleys.

Nearly 40 percent of the schedule is directed at our community's most precious resource, our children. Approximately 1200 hours of K-12 instructional programs (ITV) are broadcast during the school year in partnership with the Virginia Department of Education. According to a Department of Education survey, WVPT had the highest utilization rate of ITV in the state, with 95 percent of schools and nearly 70 percent of teachers using WVPT*s instructional programming in their classrooms. In order to meet community needs for adult learning opportunities, WVPT offers GED programming, work force literacy programs, and college credit telecourses in conjunction with two community colleges.

As stated in its Articles of Incorporation, the Shenandoah Valley Educational Television Corporation is organized exclusively for educational purposes. No part of its net earnings inure to the benefit of any director, officer or individual. The principal purpose is to establish and furnish a nonprofit educational broadcasting service.

WVPT's stated mission is to "provide high quality, noncommercial programming and services that educate, inform, enlighten and entertain the people of the Shenandoah Valley and Western Piedmont Region."

Exhibit B

WVPT's Board of Directors is a distinguished group of citizens dedicated to the power of public television, and representing a broad cross-section of educational, business and civic segments of the community. The 16 current board members include the following:

The current Chairman of the Board is Dr. Robert M. O'Neil. A Charlottesville resident, Dr. O'Neil is a former president of the University of Virginia in Charlottesville, and currently Director of the world-renowned Thomas Jefferson Center for the Protection of Free Expression in Charlottesville. He also continues on the University of Virginia Law faculty. He also served as president of the University of Wisconsin (license holder of WHA-TV-PBS), and Vice President of Indiana University. Dr. O'Neil also serves on the boards of many national educational organizations in leadership positions and as counsel.

Leigh Middleditch, a Charlottesville resident, is a partner with the law firm McGuire, Woods, Battle and Booth in Charlottesville. He is active in many civic and cultural activities.

G. McNeir "Mackey" Tilman , a lifelong Charlottesville resident, is Senior Vice President and Market Manager, with Wachovia in Charlottesville. He is president of the Charlottesville Rotary, and Director of the Ashlawn Music Festival.

Ms. Olivia Boykin is Vice Chair of the Charlottesville School Committee.

Dr. Linwood Rose is president of James Madison University.

Mr. Jeff Lenhart is an attorney with the law firm Wharton, Aldhizer and Weaver.

Dr. James Davis is president of Shenandoah University.

Raymond "Andy" Guest, a farmer and investment banker, served as a Virginia state delegate for 28 years.

George Pace serves as Chief Executive Officer of ROCCO, one of the largest poultry producers in the nation.

Mrs. Nancy Walsh serves on the Frederick County School Board.

William Conklin is a Vice President with Merck and Co., and head of the Stonewall Plant in Elkton, Virginia.

Dr. Brad Roof is a professor of accounting at James Madison University.

Sam Ashworth is Senior Vice President, 1st Citizens Bank.

Dr. Jeremiah Sullivan is president and CEO of Sullivan and Associates.

Curtis Hartman is president of Hartman Motor Company.

Maurice Bresnahan is President and General Manager of WVPT-TV (PBS).

In addition, if WVPT receives the license to operate channel 19 in Charlottesville, the existing by-laws will allow for the addition of five more Charlottesville-based board members.

Because one of our major goals is to be responsive to community needs, WVPT also has a Community Advisory Board (CAB) in each of the communities we serve, including Charlottesville.

The CAB meets on a regular basis (at least five times a year) to discuss programming topics for WVPT's local shows. They also provide input for WVPT's educational outreach activities, community events, and local partnerships. In addition they keep WVPT informed of how WVPT can better serve our viewers in Charlottesville. The Charlottesville CAB is made up of eight distinguished members:

(See C'ville Progress Insert, page 11).

Exhibit C

WVPT plans to utilize the power of broadcasting to help carry out its mission to provide lifelong learning opportunities to everyone in greater Charlottesville. WVPT plans to broadcast noncommercial, educational programs of the highest quality from PBS, the WVPT studios, and other sources. WVPT also plans to extend the power of our programming beyond the TV screen and into the community through outreach services and local initiatives.

Nearly 40 percent of the schedule will be directed at our community's most precious resource, our children. Approximately 1200 hours of K-12 instructional programs (ITV) will be broadcast during the school year in partnership with the Virginia Department of Education. WVPT has gained valuable experience offering ITV services in the Shenandoah Valley, with 95 percent of schools and nearly 70 percent of teachers using WVPT*s instructional programming in their classrooms. WVPT will also offer telecourses in partnership with Piedmont Community College and other regional colleges.

WVPT also plans to produce local programming specifically for the Charlottesville community. Local programming will include Living in Virginia, a monthly mini-documentary profiling the culture and history of the region; Pop Quiz, a high school quiz series; Virginia Outdoors specials; and Short Takes, a weekly series that will promote charitable organizations throughout the coverage area. Consider This, a weekly public affairs series, will focus on the unique cultural, political and environmental issues of our region. WVPT will regularly produce historical documentaries specifically for Charlottesville. WVPT is also planning to broadcast public affairs forums from the University of Virginia*s Miller Center, as well as other cultural and educational events.

WVPT will make a bold and significant commitment to help the Charlottesville community achieve a critical educational goal: for all children in Charlottesville to arrive at school "ready to learn." The Ready to Learn Service will be a comprehensive array of resources, including seven hours of children's programs every day; learning tips between programs; training seminars and workshops for Charlottesville childcare providers; First Book grants that provide at-risk children with their *first books;* partnerships with Head Start and other early learning organizations; and much more. To help us in this effort, WVPT will form partnerships with businesses, schools, social service agencies, museums and organizations throughout the Charlottesville community.

WVPT received many awards and honors for its local programming last year, including two Emmy Awards and six Emmy nominations, six Telley Awards, the Virginia Association of Broadcasters top award for two years running, the Virginia Trail Lawyer*s *Excellence in Journalism* award, the American Cancer Society*s top award, a NETA award for documentary production, and several first-place awards from PBS for development, advertising and promotions.

WVPT extends the power of public television beyond the screen and into the community through educational outreach initiatives. WVPT's Young Heroes project honors young scholars, athletes and leaders who have overcome a difficult or handicapping situation. Schools, churches, and civic organizations submit nominees. The ten award recipients are featured in a television special aired on WVPT.

WVPT's Young Environmentalist Award inspires high school seniors to plan and write about a project designed to improve or sustain the environment. Last year's theme was "Race to Save the Bay," in partnership with the Chesapeake Bay Foundation. High school seniors researched the plight of the Bay and its environmental decline, and wrote scientific papers on their findings and possible solutions. The winner was presented with a $1,000 scholarship, and all finalists were honored at an awards dinner and recognized on the air.

WVPT has served Charlottesville through a low power translator for the past 12 years. Upgrading to a transmitter will allow WVPT to improve its signal to thousands of additional homes, expand our early learning and adult learning programs, find new markets for our award-winning local programming, and extend our educational outreach opportunities to more schools, community institutions and colleges. Upgrading to a transmitter will also ensure WVPT*s ability to serve Charlottesville without interference or challenges from other broadcast entities.

Addendum: WVPT's Service to Special Audiences

WVPT is committed to serving special audiences in our service area through local programming and specially targeted outreach activities.

WVPT recently completed a four hour series, "Furious Flower," which profiled contemporary African-American poets. The series included segments from a poetry festival at nearby James Madison University, as well as interviews and readings. The series was recently purchased for national distribution by California Films.

As part of our "Living in Virginia" magazine series, we produced a number of segments that respond to the needs of diverse groups. The following are examples:
LIV 104 - A look at local author Jonathan Coleman and his nationally-acclaimed book "Long Way To Go," profiling race relations.
LIV 107 - A profile of Reading for Blind & Disabled in Charlottesville, and other community resources for the visually impaired.
LIV 111 - Profile of James Madison University's youngest graduate, 15 year-old Jessica Woodspowers, and the program for gifted young women at Mary Baldwin College in Staunton.
LIV 113 - Domestic Violence in the Shenandoah Valley, and where women can turn for help.
LIV 120 - A profile of the northern valley ARC (Association for Retarded Citizens)
LIV 124 - Breast Cancer Awareness; a profile of women who have recovered; facts on examinations. (Winner of the 1998 American Cancer Society Virginia Media Award)

"Blue Ridge Journal," another WVPT series, also regularly focused on topics of interest to diverse groups:
BRJ 307 - A look at welfare reform legislation in Virginia, and its affect on local residents
BRJ 309 An examination of race relations, with a profile of the Monticello Area Community Action Agency, which fights poverty primarily in African American neighborhoods
BRJ 310 - Profile of the Virginia Special Olympics
BRJ 314 - Profile of the Adaptive ski program at Wintergreen Resort

Our series "Virginia Outdoors" won the Virginia Association of Broadcaster's top award for a special on recreational opportunities for people with disabilities. The program also received a VATS grant for Closed Captioning and DVS distribution.

WVPT's Ready to Learn initiative targets at-risk youth through Head Start, Even Start, Boys and Girls Clubs, and other community-based institutions that serve diverse constituencies. As part of our Ready to Learn program, WVPT also participates in First Book, distributing free books and encouraging reading among at-risk youth.

Exhibit D
FCC Form 340
Section II – Legal Qualifications, #8

Name & Addrss	Office Held	Director	% of Ownership
Dr. Robert M. O'Neil 400 Peter Jefferson Place Charlottesville, VA 22901	Chairman	Yes	N/A
Mr. Jeffrey G. Lenhart 1052 Wyndham Drive Harrisonburg, VA 22801	Vice-Chairman	Yes	N/A
Mr. Maurice J. Bresnahan 298 Port Republic Road Harrisonburg, VA 22801	President	Yes	N/A
Dr. Brad Roof 1248 Bluewater Road Harrisonburg, VA 22801	Treasurer	Yes	N/A
Mr. Curtis Hartman 1711 S. Main Street Harrisonburg, VA 22801	Secretary	Yes	N/A
Mr. Sam Ashworth PMB 120 600-D University Blvd. Harrisonburg, VA 22801		Yes	N/A
Ms. Olivia M. Boykin 307 Monte Vista Ave Charlottesville VA 22903		Yes	N/A
Mr. William H. Conklin Merck & Co POB 7 Elkton VA 22827		Yes	N/A
Dr. Jim Davis Shenandoah University 1460 University Drive Winchester, VA 22601		Yes	N/A
Mr. Raymond "Andy" Guest		Yes	N/A

Mr. Leigh B. Middleditch, Jr McGuire, Woods, Battle, & Boothe Court Square Building POB 1288 418 E. Jefferson Street Charlottesville, VA 22901	Yes	N/A
Mr. George Pace ROCCO POB 549 Harrisonburg, VA 22801	Yes	N/A
Dr. Linwood H. Rose James Madison University President's Office Alumni Hall MSC 7608 Harrisonburg, VA 22807	Yes	N/A
Mr. Jeremiah B. Sullivan 394 Wynnwood Lane Harrisonburg, VA 22801	Yes	N/A
Mr. G. McNeir "Mackey" Tilman 650 Knoll Ridge Drive Charlottesville, VA 22903-9241	Yes	N/A
Mrs. Nancy Walsh 112 Country Club Circle Winchester VA 22601	Yes	N/A

Exhibit E
FCC Form 340
Section II, Legal Qualifications, #10b & 10c

- On January 14, 1986, The Shenandoah Valley Educational Television Corporation ("SVETC") field an application (File No. BPET-860115KF) for a new noncommercial television station in Charlottesville, Virginia. The application was mutually exclusive with an application (File No. BPET-851224KH) Filed on or about December 24, 1985 by Central Virginia Educational Television Corporation.

  The applications were designated for hearing in MM Docket 86-215.

  The applicants reached a settlement before the hearing date.

  The application of Central Virginia Educational Television Corporation was granted, and the application of SVETC was dismissed with prejudice.

- On June 17, 1987, SVETC filed an application (BPTT-870617IA) for a new TV translator station at Ruckersville, Virginia on Channel 38.

  That application was dismissed by the Commission on March 25, 1988.

SECTION V-C - TV BROADCAST ENGINEERING DATA	FOR COMMISSION USE ONLY File No. ____ SSB Referral Date ____ Referred By ____

Name of Applicant	Call Letters (if issued)
Shenandoah Valley Educational Television Corporation	TBA

Purpose of Application: (check appropriate boxes)

- [X] Construct a new (main) facility
  See Ex #E1, Engineering Statement
- [ ] Modify existing construction permit for main facility
- [ ] Modify licensed main facility
- [ ] Construct a new auxiliary antenna
- [ ] Modify existing construction permit for auxiliary antenna
- [ ] Modify licensed auxiliary antenna

If purpose is to modify, indicate the nature of change(s) by checking appropriate box(es) and specify the file number(s) of the authorizations affected.

- [ ] Antenna supporting structure height
- [ ] Antenna height above average terrain
- [ ] Antenna location
- [ ] Main Studio location per 47 C.F.R. Section 73.1125(b)(2)
- [ ] Effective radiated power
- [ ] Frequency
- [ ] Antenna system
- [ ] Other (summarize)

File Number(s) ____

1. Allocation:

Channel No. 19

Offset (check one)
- [ ] Plus
- [X] Minus
- [ ] Zero

Principal community to be served:		
County	City or Town	State
Albemarle	Charlottesville	VA

Zone (check one)
- [X] I
- [ ] II
- [ ] III

2. Exact location of antenna.
   (a) Specify address, city, county and state. If no address, specify distance and bearing relative to the nearest town or landmark. Carter's Mountain
   3.1 Miles South Charlottesville, VA
   (b) Geographical coordinates (to nearest second). If mounted on element of an AM array, specify coordinates of center of array. Otherwise, specify tower location. Specify South Latitude and East Longitude where applicable; otherwise, North Latitude or West Longitude will be presumed. *(The Commission requires coordinates based on NAD 27.)*

Latitude	37 °	58 '	59 "	Longitude	78 °	29 '	02 "

3. Is the supporting structure the same as that of another station(s) or proposed in another pending application(s)? [X] Yes [ ] No

If Yes, give call letter(s) or file number(s) or both. WHTJ, BLET 890421KE

If proposal involves a change in height of an existing structure, specify existing height above ground level including antenna, all other appurtenances, and lighting, if any. N/A

4. Does the application propose to correct previous site coordinates? ☐ Yes ☒ No
If Yes, list old coordinates.

Latitude	o	'	"	Longitude	o	'	"

5. Is the transmitting antenna mounted on a tower that has been registered with the Commission? ☒ Yes ☐ No

If Yes, list the Antenna Structure Registration Number: 1018222

If No, has an application (FCC Form 854) been filed with the Commission? ☐ Yes ☐ No N/A

If No, attach as an Exhibit an explanation why the Antenna Structure does not meet FAA Notification criteria as defined under 47 C.F.R. Section 17.7 and, therefore, does not require registration. Exhibit No. N/A

6. Has the FAA been notified of the proposed construction? ☐ Yes ☒ No*
Existing authorized tower.
If Yes, give date and office where notice was filed and attach as an Exhibit a copy of FAA determination, if available. Exhibit No.

Date _____ Office where filed _____

7. List all landing areas within 8 km of antenna site. Specify distance and bearing from structure to nearest point of the nearest runway.

	Landing Area	Distance (km)	Bearing (degrees True)
(a)	None		
(b)			

8. (a) Elevation (*to the nearest meter)*

(1) of site above mean sea level; 427 meters

(2) of the top of supporting structure above ground (including antenna, all other appurtenances, and lighting, if any); and 91 meters

(3) of the top of supporting structure above mean sea level [(a)(1) + (a)(2)]. 518 meters

(b) Height of antenna radiation center: (to the nearest meter)

(1) above ground; 75 meters

(2) above mean sea level [(a)(1) + (b)(1)]; and 503* meters
*Figure from vertical sketch to avoid rounding error.

(3) above average terrain. 340 meters

9. Attach as an Exhibit sketch(es) of the supporting structure, labeling all elevations required in Question 7 above, except item 7(b)(3). If mounted on an AM directional array element, specify heights and orientations of all array towers, as well as location of AM radiator. Exhibit No. E2

10. Maximum visual effective radiated power: 904 kw

11. Antenna

(a) Manufacturer Andrew (b) Model No. ATW13H6

(c) Is a directional antenna proposed? [X] Yes [ ] No

If Yes, specify major lobe azimuth(s) 45 T degrees True and attach as an Exhibit all data specified in 47 C.F.R. Section 73.685. Exhibit No. E3

(d) Is electrical beam tilt proposed? [X] Yes [ ] No

If Yes, specify 1.5 degrees electrical beam tilt and attach as an Exhibit all data specified in 47 C.F.R. Section 73.685. Exhibit No. E3

(e) Is mechanical beam tilt proposed? [ ] Yes [X] No

If Yes, specify ——— degrees mechanical beam tilt toward azimuth ———degrees True and attach as an Exhibit all data specified in 47 C.F.R. Section 73.685. Exhibit No. N/A

(f) The proposed antenna is: (check only one box)

[X] Horizontally polarized [ ] Circularly polarized [ ] Elliptically polarized

12. Will the proposed facility satisfy the requirements of 47 C.F.R. Sections 73.685(a) and (b)? [X] Yes [ ] No

If No, attach as an Exhibit justification therefor, including amounts and percentages of population and area that will not receive City Grade service. Exhibit No.

13. Will the main studio be located within the station's predicted principal community contour as defined by 47 C.F.R. Section 73.685(a)? [X] Yes [ ] No

If No, attach as an Exhibit justification pursuant to 47 C.F.R. Section 73.1125. Exhibit No.

14 Does the proposed facility satisfy the requirement of 47 C.F.R. Section 73.610? [X] Yes [ ] No *

If No, attach as an Exhibit justification therefor, including a summary of any previously granted waivers. Exhibit No. N/A

*See Ex #E7, Channel Study

15. Are there: (a) within 60 meters of the proposed antenna, any proposed or authorized FM or TV transmitters; or (b) in the general vicinity, any nonbroadcast *(except citizens band or amateur)* radio stations or any established commercial or government receiving stations?

[X] Yes [ ] No

If Yes, attach as an Exhibit a description of any expected, undesired effects of operations and remedial steps to be pursued if necessary, and a statement accepting full responsibility for the elimination of any objectionable interference (*including that caused by intermodulation*) to facilities in existence or authorized prior to grant of this application. *(See 47 C.F.R. Sections 73.685(d) and (g).)*

Exhibit No. E4

16. Attach as an Exhibit a topographic map that shows clearly, legibly, and accurately, the location of the proposed transmitting antenna. This map must comply with the provisions of 47 C.F.R. Section 73.684(g). The map must further display clearly and legibly the original printed contour lines and data as well as latitude and longitude markings, and must bear a scale of distance in kilometers.

Exhibit No. E5

17. Attach as an Exhibit a map (*Sectional Aeronautical Chart or equivalent)* which shows clearly, legibly, and accurately, and with the original printed latitude and longitude markings and a scale of distance in kilometers:

Exhibit No. E6

(a) the proposed transmitter location, and the radials along which profile graphs have been prepared;
(b) the City Grade, Grade A and Grade B contours; and
(c) the legal boundaries of the principal community to which the station is or will be licensed.

18. Specify area in square kilometers (1 sq. mi. = 2.59 sq. km.) and population (*latest census)* within the predicted Grade B contour.

Area 14,269 sq. km. Population 339,325

19. For an application involving an auxiliary backup facility only, attach as an Exhibit a map (*Sectional Aeronautical Chart or equivalent)* that shows clearly, legibly, and accurately, and with latitude and longitude markings and a scale of distance in kilometers:

Exhibit No. N/A

(a) the proposed auxiliary Grade B contour; and
(b) the Grade B contour of the licensed main facility for which the applied-for facility will be auxiliary. Also specify the file number of the license.

(Main facility license file number: _____)

Section V-C - TV BROADCAST ENGINEERING DATA (Page 5)

20. Terrain and coverage data (to be calculated in accordance with 47 C.F.R. Section 73.684)

Source of terrain data: (check only one box below)

☐ Linearly interpolated 30-second database (Source: _____)

☐ 7.5 minute topographic map

☒ Other (briefly summarize) USGS 03 sec - V-Soft ROM

Radial bearing (degrees True)	Height of radiation center above average elevation of radial from 3 to 16 km (meters)	Predicted Distances		
		To the City Grade Contour (kilometers)	To the Grade A contour (kilometers)	To the Grade B contour (kilometers)
*	*	*	*	*
0	*See Ex #E1, Pg #3	*	*	*
45	*	*	*	*
90				
135				
180				
225				
270				
315				

*Radial through principal community, if not one of the major radials. This radial should NOT be included in the calculation of HAAT.

21. Environmental Statement. *(See 47 C.F.R. Section 1.1301 et seq.)*

(a) Would a Commission grant of this application come within 47 C.F.R. Section 1.1307, such that it may have a significant environmental impact? ☐ Yes ☒ No

If you answer Yes, submit as an Exhibit an Environmental Assessment required by 47 C.F.R. Section 1.1311. Exhibit No.

(b) If No, explain briefly why not.

(c) Pursuant to OST Bulletin No. 65, October 1985, entitled "Evaluating Compliance with FCC-Specified Guidelines for Human Exposure to Radiofrequency Radiation," the applicant must explain in an Exhibit what steps will be taken to limit the RF radiation exposure to the public and to persons authorized access to the tower site. In addition, where there are multiple contributors to radiofrequency radiation, you must certify that the established RF radiation exposure procedures will be coordinated with all stations. See Ex #E8

CERTIFICATION

I certify that I have prepared this Section of this application on behalf of the applicant, and that after such preparation, I have examined and found it to be accurate and true to the best of my knowledge and belief.

Name (Typed or Printed)	Relationship to Applicant (e.g., Consulting Engineer)
Douglas L. Vernier	Technical Consultant
Signature: Douglas L Vernier	Address (include ZIP Code) 1600 Picturesque Drive Cedar Falls, IA 50613
Date November 15, 1999	Telephone No. (include Area Code) 319 266-8402

SECTION VI - EQUAL EMPLOYMENT OPPORTUNITY PROGRAM

Does the applicant propose to employ five or more full-time employees? ☐ Yes ☐ No

Not Applicable--These provisions have been suspended.

If Yes, the applicant must include an EEO program called for in the separate Broadcast Equal Employment Opportunity Program Report (FCC Form 396-A). (See also 47 C.F.R. Section 73.2080.)

SECTION VII - CERTIFICATIONS

1. Has or will the applicant comply with the public notice requirements of 47 C.F.R. Section 73.3580? ☒ Yes ☐ No ☐ Not applicable (minor change)

2. By checking Yes, the applicant certifies, that, in the case of an individual applicant, he or she is not subject to a denial of federal benefits that includes FCC benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. Section 862, or, in the case of a non-individual applicant (e.g., corporation, partnership or other unincorporated association), no party to the application is subject to a denial of federal benefits that includes FCC benefits pursuant to that section. For the definition of a "party" for these purposes, see 47 C.F.R. Section 1.2002(b). ☒ Yes ☐ No

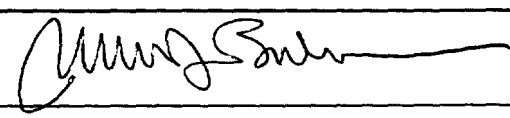
The APPLICANT hereby waives any claim to the use of any particular frequency as against the regulatory power of the United States because of the previous use of the same, whether by license or otherwise, and requests an authorization in accordance with this application. (See Section 304 of the Communications Act of 1934, as amended.)

The APPLICANT acknowledges that all the statements made in this application and attached Exhibits are considered material representations, and that all Exhibits are a material part hereof and incorporated herein.

The APPLICANT represents that this application is not filed for the purpose of impeding, obstructing, or delaying determination on any other application with which it may be in conflict.

In accordance with 47 C.F.R. Section. 1.65, the APPLICANT has a continuing obligation to advise the Commission, through amendments, of any substantial and significant changes in information furnished.

I certify that the statements in this application are true, complete, and correct to the best of my knowledge and belief, and are made in good faith.

Name Maurice J. Bresnahan	Signature 
Title President and General Manager	Date 11/19/99
Typed or Printed Name of Person Signing Maurice J. Bresnahan	

WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

Doug Vernier
1600 Picturesque Drive
Cedar Falls, Iowa 50613

Telecommunication Consultants

EXHIBIT #E1
ENGINEERING STATEMENT

Concerning the Application of
Shenandoah Valley Educational Television Corporation
To Build a New Analog Television Station

November 1999

Channel 19- **904 kW**

This engineering statement supports the application filed by Shenandoah Valley Educational Television Corporation of Harrisonburg, Virginia. The applicant requests the simultaneous allocation of channel 19 as an educational channel to serve Charlottesville, VA with permission to construct the facilities detailed below.

Under this proposal, a type approved, TV transmitter delivers its output to an Andrew ATW13H6 horizontally polarized antenna that radiates a maximum of 904 kilowatts. The aural power will be injected at ten percent the NTSC peak.

Vertical Sketch: Exhibit #E2 is the vertical sketch of the existing tower structure. The tower registration number is 1018222.

Antenna Pattern: Exhibit #E3 is an azimuth plot of the proposed antenna pattern. Page # 2 of this exhibit is a graph of the antenna's vertical elevation field.

Blanketing and Intermodulation: Exhibit #E4 is an exhibit concerning the impact of potential blanketing and intermodulation interference and the remedial action which will be taken.

Site Map: Exhibit # E5 is a 1:24,000, 7 ½ minute site map (Simeon Quadrangle) showing the exact location of the proposed transmitting facility.

Coverage Map: Exhibit #E6 is a map of the proposed one mV/m (60 dBu), F(50-50) coverage signal contour which shows the eight cardinal radials. The zero degree radial travels through Charlottesville, the city of license. The political boundaries of Charlottsville, Virginia are shown to be fully encompassed by the proposed 80 dBu city service contour. The coverage map was computer generated using an enhanced U.S.G.S. World mapping database. The NGDC 03 arc second terrain database was used

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to project the all contour distances along 360 evenly spaced radials. The area within the proposed 64 dBu contour amounts to 14,269 square kilometers. This figure was determined by using numerical calculus.[1] The population within the 64 dBu service contour was determined to be 329,325 people through the use of a computer program which extracts a population count based on population centroids defined by U.S. Census 1990 (PL-94-171) digital census data. This program draws data from the following summary level: State-County-Voting District/Remainder-County Subdivision, Place/Remainder-Census Tract/Block Numbering Area-Block Group to Block.

Allocation Study:

Exhibit #E7, is an allocation study showing that the proposed station can be operated on channel 19 from the proposed site while meeting all minimum spacings required in Section. 73.610 of the Commission's rules.

Though the minimum spacings are fully met, we studied the proposed station's relationship with several DTV allocations. The techniques detailed in OET #69 were used to determine that the proposed facility operating at 904 kW, from an antenna height of 502.55 meters above mean sea level using the proposed directional antenna, having 1.5 degrees beam tilt, will not raise the interference level to any of the DTV allocation facilities by more than two percent. Our studies show that the only two relevant digital allocations are those for channel 19 (WBFX-D) in Lexington, NC and channel 20 (WJPR-D) in Lynchburg, VA. The interference caused to WBFX-D amounts to 7,195 people, which amounts to .503 percent of the WBFX-D noise limited base population. Interference to WJPR-D affects 78 people, which is only .004 percent. The addition of the proposed facility will bring the total interference received by WBFX-D to 3.1 percent of its noise limited base, while WJPR-D's total received interference will be increased to 6.404 percent. Page # 2 of this exhibit is a map plotting the location of the interference. Page #3 is a tabulation of the population affected. Note that power toward the **Green Bank, WV Observatory** is identical to the applicant's power operated from the same site under license to W19BB. Operation at the requested power toward Green Bank has already been coordinated with and approved by the Observatory.

R.F. Hazard compliance:

Exhibit #E8 shows compliance with the Commission's R.F. radiation standards.

Page #3 of this exhibit (Ex. # E1) is a tabulation of antenna height above average terrain and the distances to the Grade B, Grade A and City Grade signal contours. Page #4 of this exhibit is a statement of qualifications of the preparer, Doug Vernier.

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[1] Squaring the distance to the 60 dBu signal contour along the 360 evenly spaced radial azimuths and then taking the average of the sum. The resulting average radius [squared] was then multiplied by π to determine the area within the contour.

Doug Vernier Telecommunications Consultants
N. Lat. = 37 58 59 W. Lng. = 78 29 02
HAAT and Distance to Contour - FCC Method - 03 Arc. Sec.
Shenandoah Valley Educational TV Corporation

Azi.	AV EL	HAAT	kW	dBk	Field	64 .5	74 .5	80 .5
000	137.4	365.2	531.8133	27.26	.767	69.46	53.37	44.14
010	129.5	373.1	709.6364	28.51	.886	72.39	55.71	46.41
020	128.8	373.8	845.3205	29.27	.967	73.92	56.93	47.61
030	141.6	361.0	887.8012	29.48	.991	73.33	56.59	47.36
040	208.8	293.8	900.3876	29.54	.998	68.08	52.91	44.13
050	255.4	247.2	902.1929	29.55	.999	64.68	50.25	41.78
060	144.4	358.2	869.9744	29.40	.981	72.93	56.30	47.09
070	124.3	378.3	814.1433	29.11	.949	73.95	56.90	47.55
080	120.1	382.5	790.2994	28.98	.935	74.00	56.91	47.53
090	118.2	384.4	822.7449	29.15	.954	74.49	57.28	47.88
100	114.7	387.9	868.2017	29.39	.980	75.21	57.83	48.39
110	107.5	395.1	887.8012	29.48	.991	75.93	58.35	48.83
120	130.1	372.5	886.0104	29.47	.990	74.23	57.18	47.87
130	141.1	361.5	857.6031	29.33	.974	73.07	56.38	47.15
140	149.3	353.3	809.0040	29.08	.946	71.93	55.56	46.38
150	150.7	351.9	786.9221	28.96	.933	71.60	55.30	46.13
160	153.4	349.2	821.0209	29.14	.953	71.73	55.43	46.28
170	150.2	352.4	873.5252	29.41	.983	72.49	56.02	46.84
180	143.7	358.9	893.1846	29.51	.994	73.21	56.52	47.30
190	148.8	353.8	884.2214	29.47	.989	72.71	56.18	46.99
200	156.4	346.2	866.4306	29.38	.979	71.92	55.63	46.49
210	171.9	330.7	805.5870	29.06	.944	70.12	54.29	45.25
220	177.3	325.3	650.0700	28.13	.848	68.10	52.57	43.60
230	166.0	336.6	477.7902	26.79	.727	66.66	51.17	42.15
240	167.4	335.2	357.6595	25.53	.629	64.54	49.19	40.21
250	201.0	301.6	261.6574	24.18	.538	60.31	45.44	36.77
260	210.6	292.0	150.4834	21.77	.408	56.11	41.50	32.93
270	216.6	286.0	64.4453	18.09	.267	50.33	35.97	27.65
280	237.1	265.5	34.3746	15.36	.195	45.29	31.20	23.40
290	220.5	282.1	33.6731	15.27	.193	46.03	31.80	23.93
300	199.9	302.7	34.0230	15.32	.194	47.16	32.70	24.70
310	178.6	324.0	39.8664	16.01	.210	49.31	34.54	26.24
320	166.1	336.5	84.0946	19.25	.305	54.89	39.84	30.99
330	166.5	336.1	184.6908	22.66	.452	60.11	44.92	36.00
340	159.4	343.2	297.8463	24.74	.574	63.78	48.41	39.38
350	145.8	356.8	397.3704	25.99	.663	66.67	51.01	41.85
Additional Radials: (Not Considered in Average):								
045	232.7	269.9	904.0000	29.56	1.000	66.31	51.56	42.96
284	237.3	265.3	32.6344	15.14	.190	44.96	30.88	23.12

Ave El= 162.20 M HAAT= 340.35 M AMSL= 502.55 M

Declaration:

I, Doug Vernier, declare that I have received training as an engineer from the University of Michigan School of Engineering. That, I have received degrees from the University in the field of Broadcast Telecommunications. That, I have been active in broadcast consulting for over 25 years;

That, I have held a Federal Communications Commission First Class Radiotelephone License continually since 1964. In 1985, this license was reissued by the Commission as a lifetime General Radiotelephone license no. PG-16-16464;

That, I am certified as a Professional Broadcast Engineer (#50258) by the Society of Broadcast Engineers, Indianapolis, Indiana. (Re-certified 11/95.)

That, my qualifications are a matter of record with the Federal Communications Commission;

That, I have been retained by Shenandoah Valley Educational Television Corporation and as such have prepared the engineering showings appended hereto;

That, I have prepared these engineering showings, the technical information contained in same and the facts stated within are true of my knowledge;

That, under penalty of perjury, I declare that the foregoing is correct.

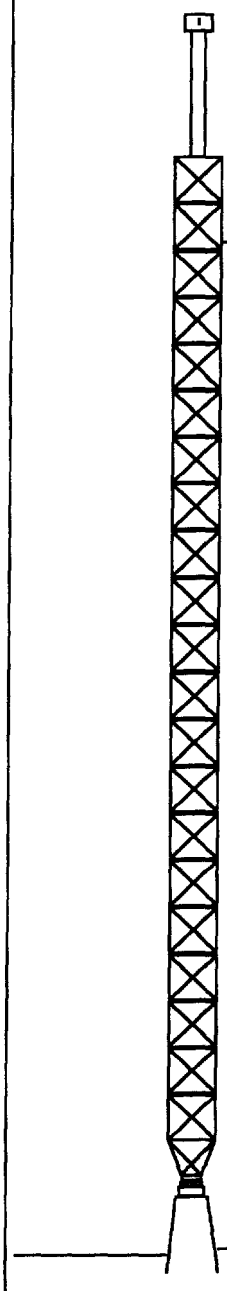
Douglas L. Vernier

Executed on November 17, 1999

Subscribed and sworn before me this 17th day of November, 1999.

Notary Public in and for the State of Iowa

My Commission Expires August 10, 2001



<---- 90.5M AG, 517.6M AMSL

<---- 86.3M AG, 513.4M AMSL, (WHTJ (TV))

<---- 75.45M AG, 502.55M AMSL, (Proposed)

GROUND ELEVATION = 427.1M

VERTICAL SKETCH

N. Lat. 37 58 59
W. Lng. 78 29 02

Reg# 1018222
Carter's Mountain 3.1 Mi
South of Charlottsville, VA

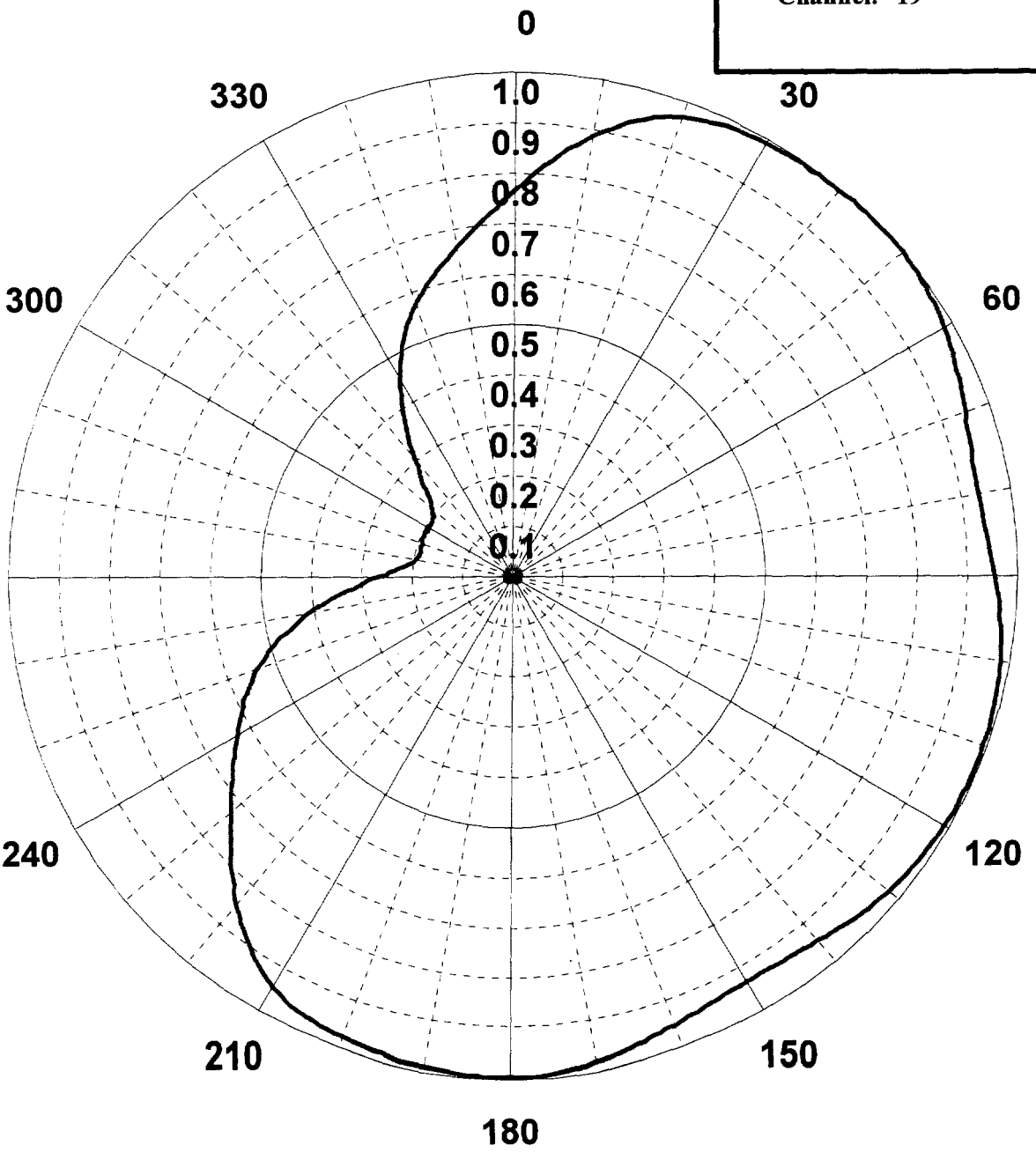
EXHIBIT #E2

SHENANDOAH VALLEY ED. TV
CH 19 - 340.35 M HAAT
904 kW ERP
Nov '99

DOUG VERNIER
BROADCAST CONSULTANT
1600 PICTURESQUE DR.
CEDAR FALLS, IA 50613
319 266-8402

ANDREW

Type: ATW-C1
Gain: 1.52 (1.82 dB)
Polarization: Horizontal
Channel: 19



ANDREW CORPORATION
10500 W. 153rd Street
Orland Park, Illinois U.S.A. 60462

Company: V-Soft Communication Date: 11/6/99
Site: W19BB Author: D. Vernier
Proposal Number: 0023

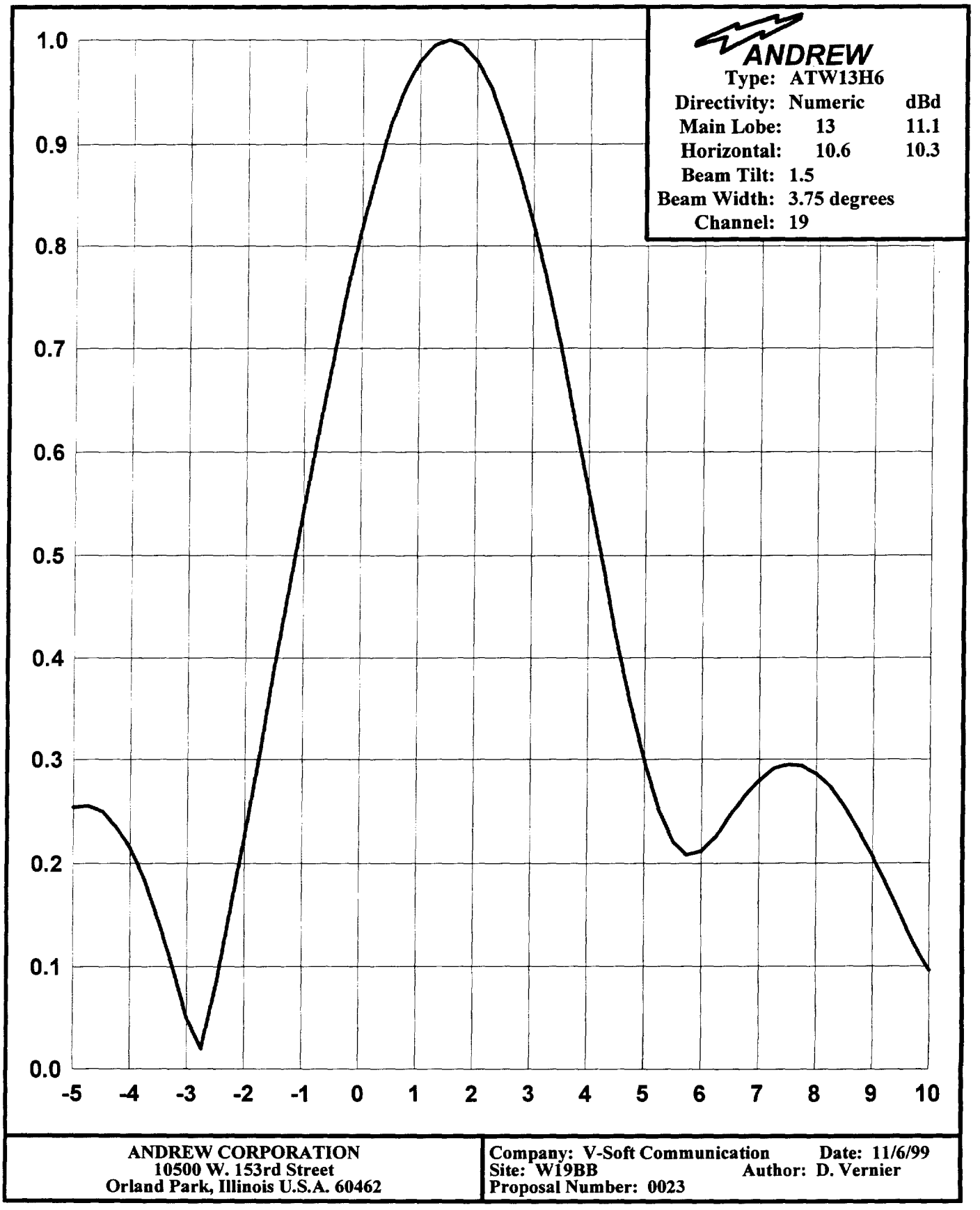
ANDREW

Type: ATW-C1 Gain: 1.52 (1.82 dB)
Polarization: Horizontal Channel: 19

Angle	Amp	dB	Angle	Amp	dB	Angle	Amp	dB	Angle	Amp	dB	Angle	Amp	dB
0	0.767	-2.30	72	0.943	-0.51	144	0.937	-0.57	216	0.893	-0.98	288	0.192	-14.33
1	0.778	-2.18	73	0.941	-0.53	145	0.935	-0.58	217	0.882	-1.09	289	0.192	-14.33
2	0.790	-2.05	74	0.939	-0.55	146	0.934	-0.59	218	0.871	-1.20	290	0.193	-14.29
3	0.803	-1.91	75	0.938	-0.56	147	0.933	-0.60	219	0.860	-1.31	291	0.194	-14.24
4	0.815	-1.78	76	0.936	-0.57	148	0.932	-0.61	220	0.848	-1.43	292	0.195	-14.20
5	0.827	-1.65	77	0.935	-0.58	149	0.932	-0.61	221	0.836	-1.56	293	0.195	-14.20
6	0.839	-1.52	78	0.934	-0.59	150	0.933	-0.60	222	0.823	-1.69	294	0.195	-14.20
7	0.852	-1.39	79	0.934	-0.59	151	0.933	-0.60	223	0.811	-1.82	295	0.195	-14.20
8	0.863	-1.28	80	0.935	-0.58	152	0.934	-0.59	224	0.799	-1.95	296	0.195	-14.20
9	0.875	-1.16	81	0.935	-0.58	153	0.935	-0.58	225	0.787	-2.08	297	0.195	-14.20
10	0.886	-1.05	82	0.936	-0.57	154	0.937	-0.57	226	0.775	-2.21	298	0.194	-14.24
11	0.897	-0.94	83	0.937	-0.57	155	0.939	-0.55	227	0.762	-2.36	299	0.194	-14.24
12	0.907	-0.85	84	0.939	-0.55	156	0.942	-0.52	228	0.750	-2.50	300	0.194	-14.24
13	0.917	-0.75	85	0.941	-0.53	157	0.944	-0.50	229	0.738	-2.64	301	0.193	-14.29
14	0.926	-0.67	86	0.943	-0.51	158	0.947	-0.47	230	0.727	-2.77	302	0.193	-14.29
15	0.935	-0.58	87	0.945	-0.49	159	0.950	-0.45	231	0.716	-2.90	303	0.193	-14.29
16	0.942	-0.52	88	0.948	-0.46	160	0.953	-0.42	232	0.706	-3.02	304	0.194	-14.24
17	0.950	-0.45	89	0.951	-0.44	161	0.956	-0.39	233	0.695	-3.16	305	0.195	-14.20
18	0.956	-0.39	90	0.954	-0.41	162	0.960	-0.35	234	0.685	-3.29	306	0.197	-14.11
19	0.962	-0.34	91	0.957	-0.38	163	0.963	-0.33	235	0.675	-3.41	307	0.198	-14.07
20	0.967	-0.29	92	0.960	-0.35	164	0.966	-0.30	236	0.666	-3.53	308	0.201	-13.94
21	0.972	-0.25	93	0.963	-0.33	165	0.969	-0.27	237	0.656	-3.66	309	0.205	-13.76
22	0.976	-0.21	94	0.966	-0.30	166	0.972	-0.25	238	0.647	-3.78	310	0.210	-13.56
23	0.979	-0.18	95	0.968	-0.28	167	0.975	-0.22	239	0.638	-3.90	311	0.215	-13.35
24	0.982	-0.16	96	0.971	-0.26	168	0.978	-0.19	240	0.629	-4.03	312	0.221	-13.11
25	0.985	-0.13	97	0.974	-0.23	169	0.981	-0.17	241	0.621	-4.14	313	0.228	-12.84
26	0.987	-0.11	98	0.976	-0.21	170	0.983	-0.15	242	0.612	-4.26	314	0.237	-12.51
27	0.988	-0.10	99	0.978	-0.19	171	0.985	-0.13	243	0.604	-4.38	315	0.246	-12.18
28	0.989	-0.10	100	0.980	-0.18	172	0.987	-0.11	244	0.595	-4.51	316	0.257	-11.80
29	0.991	-0.08	101	0.982	-0.16	173	0.989	-0.10	245	0.587	-4.63	317	0.267	-11.47
30	0.991	-0.08	102	0.984	-0.14	174	0.990	-0.09	246	0.577	-4.78	318	0.279	-11.09
31	0.992	-0.07	103	0.985	-0.13	175	0.992	-0.07	247	0.568	-4.91	319	0.291	-10.72
32	0.992	-0.07	104	0.987	-0.11	176	0.993	-0.06	248	0.559	-5.05	320	0.305	-10.31
33	0.993	-0.06	105	0.988	-0.10	177	0.994	-0.05	249	0.549	-5.21	321	0.318	-9.95
34	0.994	-0.05	106	0.989	-0.10	178	0.994	-0.05	250	0.538	-5.38	322	0.333	-9.55
35	0.995	-0.04	107	0.990	-0.09	179	0.994	-0.05	251	0.527	-5.56	323	0.348	-9.17
36	0.995	-0.04	108	0.991	-0.08	180	0.994	-0.05	252	0.515	-5.76	324	0.363	-8.80
37	0.996	-0.03	109	0.991	-0.08	181	0.994	-0.05	253	0.504	-5.95	325	0.378	-8.45
38	0.996	-0.03	110	0.991	-0.08	182	0.994	-0.05	254	0.492	-6.16	326	0.393	-8.11
39	0.997	-0.03	111	0.991	-0.08	183	0.994	-0.05	255	0.479	-6.39	327	0.408	-7.79
40	0.998	-0.02	112	0.992	-0.07	184	0.994	-0.05	256	0.465	-6.65	328	0.423	-7.47
41	0.998	-0.02	113	0.992	-0.07	185	0.993	-0.06	257	0.452	-6.90	329	0.438	-7.17
42	0.999	-0.01	114	0.992	-0.07	186	0.992	-0.07	258	0.437	-7.19	330	0.452	-6.90
43	0.999	-0.01	115	0.992	-0.07	187	0.991	-0.08	259	0.423	-7.47	331	0.467	-6.61
44	1.000	0.00	116	0.992	-0.07	188	0.991	-0.08	260	0.408	-7.79	332	0.481	-6.36
45	1.000	0.00	117	0.991	-0.08	189	0.990	-0.09	261	0.393	-8.11	333	0.495	-6.11
46	1.000	0.00	118	0.991	-0.08	190	0.989	-0.10	262	0.378	-8.45	334	0.508	-5.88
47	1.000	0.00	119	0.990	-0.09	191	0.988	-0.10	263	0.363	-8.80	335	0.520	-5.68
48	1.000	0.00	120	0.990	-0.09	192	0.988	-0.10	264	0.348	-9.17	336	0.531	-5.50
49	1.000	0.00	121	0.989	-0.10	193	0.987	-0.11	265	0.333	-9.55	337	0.543	-5.30
50	0.999	-0.01	122	0.988	-0.10	194	0.986	-0.12	266	0.319	-9.92	338	0.553	-5.15
51	0.998	-0.02	123	0.987	-0.11	195	0.985	-0.13	267	0.305	-10.31	339	0.564	-4.97
52	0.997	-0.03	124	0.986	-0.12	196	0.984	-0.14	268	0.292	-10.69	340	0.574	-4.82
53	0.996	-0.03	125	0.984	-0.14	197	0.983	-0.15	269	0.279	-11.09	341	0.584	-4.67
54	0.995	-0.04	126	0.982	-0.16	198	0.982	-0.16	270	0.267	-11.47	342	0.593	-4.54
55	0.993	-0.06	127	0.981	-0.17	199	0.981	-0.17	271	0.255	-11.87	343	0.602	-4.41
56	0.991	-0.08	128	0.978	-0.19	200	0.979	-0.18	272	0.245	-12.22	344	0.611	-4.28
57	0.989	-0.10	129	0.976	-0.21	201	0.978	-0.19	273	0.235	-12.58	345	0.620	-4.15
58	0.986	-0.12	130	0.974	-0.23	202	0.976	-0.21	274	0.227	-12.88	346	0.628	-4.04
59	0.984	-0.14	131	0.971	-0.26	203	0.974	-0.23	275	0.219	-13.19	347	0.637	-3.92
60	0.981	-0.17	132	0.968	-0.28	204	0.971	-0.26	276	0.212	-13.47	348	0.645	-3.81
61	0.978	-0.19	133	0.966	-0.30	205	0.968	-0.28	277	0.206	-13.72	349	0.654	-3.69
62	0.975	-0.22	134	0.963	-0.33	206	0.964	-0.32	278	0.202	-13.89	350	0.663	-3.57
63	0.972	-0.25	135	0.960	-0.35	207	0.960	-0.35	279	0.198	-14.07	351	0.672	-3.45
64	0.968	-0.28	136	0.957	-0.38	208	0.955	-0.40	280	0.195	-14.20	352	0.682	-3.32
65	0.965	-0.31	137	0.954	-0.41	209	0.950	-0.45	281	0.192	-14.33	353	0.691	-3.21
66	0.962	-0.34	138	0.951	-0.44	210	0.944	-0.50	282	0.191	-14.38	354	0.701	-3.09
67	0.959	-0.36	139	0.948	-0.46	211	0.937	-0.57	283	0.190	-14.42	355	0.711	-2.96
68	0.955	-0.40	140	0.946	-0.48	212	0.929	-0.64	284	0.190	-14.42	356	0.721	-2.84
69	0.952	-0.43	141	0.943	-0.51	213	0.921	-0.71	285	0.190	-14.42	357	0.732	-2.71
70	0.949	-0.45	142	0.941	-0.53	214	0.912	-0.80	286	0.191	-14.38	358	0.744	-2.57
71	0.946	-0.48	143	0.938	-0.56	215	0.903	-0.89	287	0.191	-14.38	359	0.755	-2.44

ANDREW CORPORATION
10500 W. 153rd Street
Orland Park, Illinois U.S.A. 60462

Company: V-Soft Communication **Date: 11/6/99**
Site: W19BB **Author: D. Vernier**
Proposal Number: 0023



ANDREW CORPORATION
10500 W. 153rd Street
Orland Park, Illinois U.S.A. 60462

Company: V-Soft Communication Date: 11/6/99
Site: W19BB Author: D. Vernier
Proposal Number: 0023

ANDREW

Company: V-Soft Communication
Channel: 19
Site: W19BB
Proposal No: 0023
Date: 11/6/99
Author: D. Vernier
Antenna Type: ATW13H3-HSC1-19S

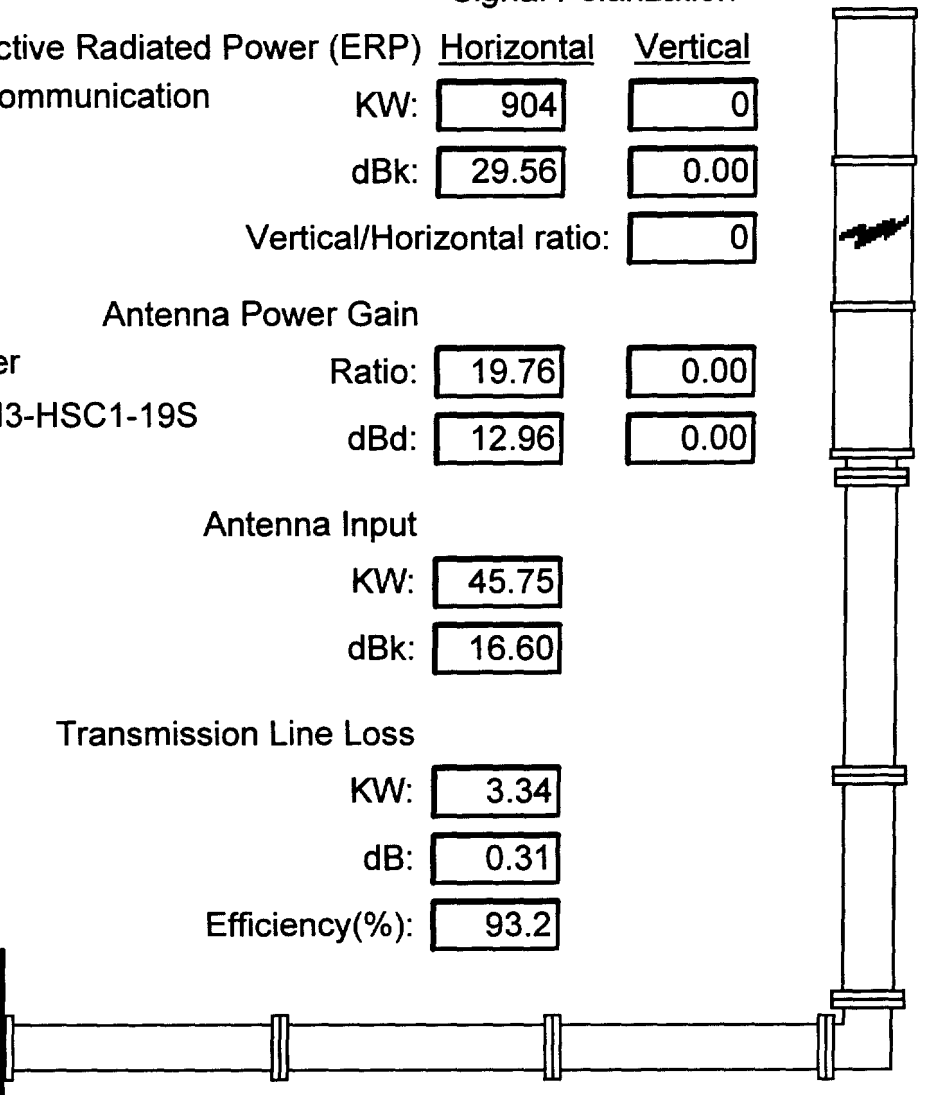
Effective Radiated Power (ERP)	Horizontal	Vertical
KW:	904	0
dBk:	29.56	0.00
Vertical/Horizontal ratio:		0

Antenna Power Gain		
Ratio:	19.76	0.00
dBd:	12.96	0.00

Antenna Input	
KW:	45.75
dBk:	16.60

Transmission Line Loss	
KW:	3.34
dB:	0.31
Efficiency(%):	93.2

Transmitter Power
kW: **49.09**
NTSC Peak + 10% Aural
dBk: 16.91



Transmission Line: 6-1/8", 50 ohm MYAT Rigid Coaxial Line
Vertical: 216 ft. Horizontal: 43 ft.

ANDREW CORPORATION **10500 W. 153rd Street** **Orland Park, Illinois U.S.A. 60462**	**Company: V-Soft Communication** **Date: 11/6/99** **Site: W19BB** **Author: D. Vernier** **Proposal Number: 0023**

EXHIBIT #E4
Blanketing Interference

November 1999

Concerning the Application of
Shenandoah Valley Educational TV Corp
Charlottesville, Virginia

The 115 dBu blanketing contour of the proposed channel 19 TV facility travels 11.8 kilometers from the proposed 904 kW ERP antenna.

There is one AM station, eight FM, 4 FM translators, two TV and four TV translators within ten kilometers of the proposed facilities. Page #2 of this exhibit is a complete listing of the broadcast related transmitters involved.

Shenandoah Valley Educational Television Corp is aware of its responsibility under the rules relating to inter-modulation and objectionable blanketing interference. It will correct any such interference, within the blanketing contour, at its own expense, within a period of one year from commencement of broadcasting at the proposed transmitter site. Corrections shall employ traditional means such as filters, traps and tuning adjustments.

ID Stations Study at 37 58 59 N, 78 29 02 W, Search Distance = 10 km

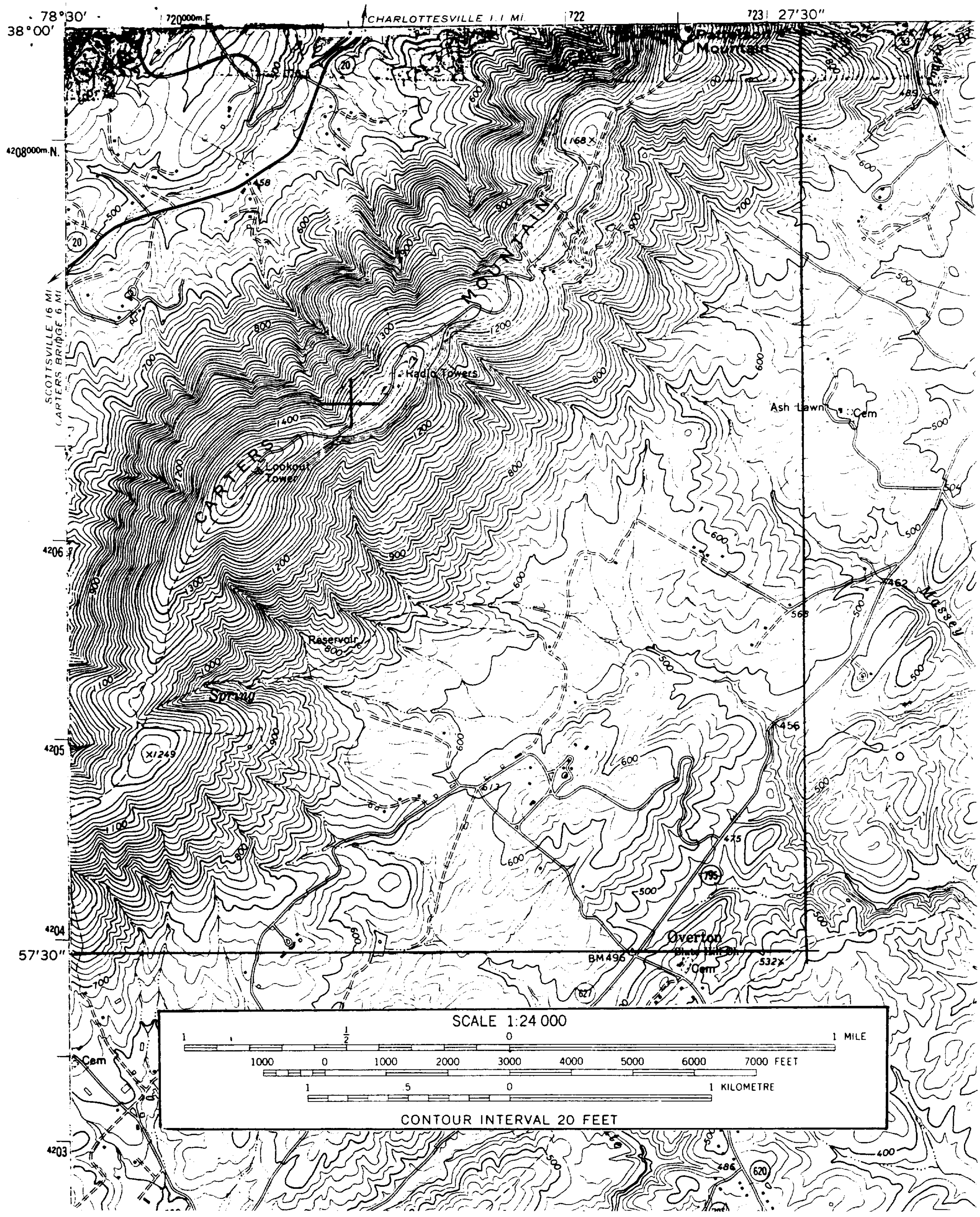
Call	City	State	Chan.	Power	Coordinates	
Dist-km	Azimuth	File Number				
AM						
WKAV	CHARLOTTESVIL	VA	1400	0001.000kW	380149N	782922W
005.3	354.7			AM		
FM						
AP218	Charlottesvil	VA	218D	0000.010kW	375859N	782902W
000.0	000.0	BPFT981102TQ		FM		
WNRN	Charlottesvil	VA	220A	0000.320kW	375855N	782903W
000.1	191.2	BLED970121KB		FM		
WTJU	Charlottesvil	VA	216B1	0000.600kW	375855N	782903W
000.1	191.2	BLED980605KI		FM		
WVTW	Charlottesvil	VA	203A	0000.120kW	375855N	782903W
000.1	191.2	BLED970925KH		FM		
WUMX	Charlottesvil	VA	298A	0000.210kW	375905N	782849W
000.4	059.6	BLH960112KD		FM		
W240AF	Charlottesvil	VA	240D	0000.050kW	375905N	782849W
000.4	059.6	BLFT960111TV		FM		
WWWV	Charlottesvil	VA	248B	0008.900kW	375905N	782849W
000.4	059.6	BLH970304KB		FM		
W209AA	Charlottesvil	VA	209D	0000.020kW	375906N	782849W
000.4	055.6	BLFT850122TA		FM		
WUVA	Charlottesvil	VA	224A	0000.750kW	375908N	782847W
000.5	052.7	BLH981119KC		FM		
W286AF	Charlottesvil	VA	286D	0000.110kW	380152N	782841W
005.4	005.5	BLFT970131TB		FM		
W231AD	Charlottesvil	VA	231D	0000.208kW	380154N	782840W
005.4	005.7	BLFT931129TC		FM		
W294AJ	Charlottesvil	VA	294D	0000.120kW	380156N	782931W
005.5	352.6	BLFT960703TF		FM		
WQMZ.C CP	Charlottesvil	VA	236A	0006.000kW	380254N	782812W
007.3	009.5	BPH990409IA		FM		
WQMZ	Charlottesvil	VA	236A	0006.000kW	380254N	782812W
007.3	009.5	BMLH891222KG		FM		
TV						
W19BB	CHARLOTTESVIL	VA	19C	0036.600kW	375858N	782900W
000.1	122.5	BLTT900305JC		TV		
WHTJ	CHARLOTTESVIL	VA	41E	0251.000kW	375858N	782900W
000.1	122.5	BLET890421KE		TV		
WVIRTV	CHARLOTTESVIL	VA	29C	5000.000kW	375900N	782854W
000.2	081.0	BLCT930210KE		TV		
W76AG	CHARLOTTESVIL	VA	76C	0001.880kW	375900N	782854W
000.2	081.0	BLTT780828IH		TV		
W64AO	CHARLOTTESVIL	VA	64C	0060.800kW	375903N	782852W
000.3	063.1	BLTT801015IC		TV		
W55CT	CHARLOTTESVIL	VA	55C	0048.700kW	375906N	782848W
000.4	057.6	BLTTL990617JD		TV		
W10CE	CHARLOTTESVIL	VA	10C	0000.115kW	380225N	783117W
007.2	332.7	BLTVL920828JI		TV		
AP526	CHARLOTTESVIL	VA	64C	3160.000kW	375848N	783440W
008.3	267.7	BPCT860410KP		TV		

CHARLOTTESVILLE WEST)

UNITED STATES
DEPARTMENT OF THE INTERIOR
GEOLOGICAL SURVEY

SIMEON QUADRANGLE
VIRGINIA
7.5 MINUTE SERIES (TOPOGRAPHIC)

Ex #E5



NEW
Latitude: 37-58-59 N
Longitude: 078-29-02 W
Power: 904.00 kW
Frequency: 503.0 MHz
Channel: 19
AMSL Height: 502.55 m
Elevation: 427.1 m
Prop Model: FCC

November '99
Doug Vernier

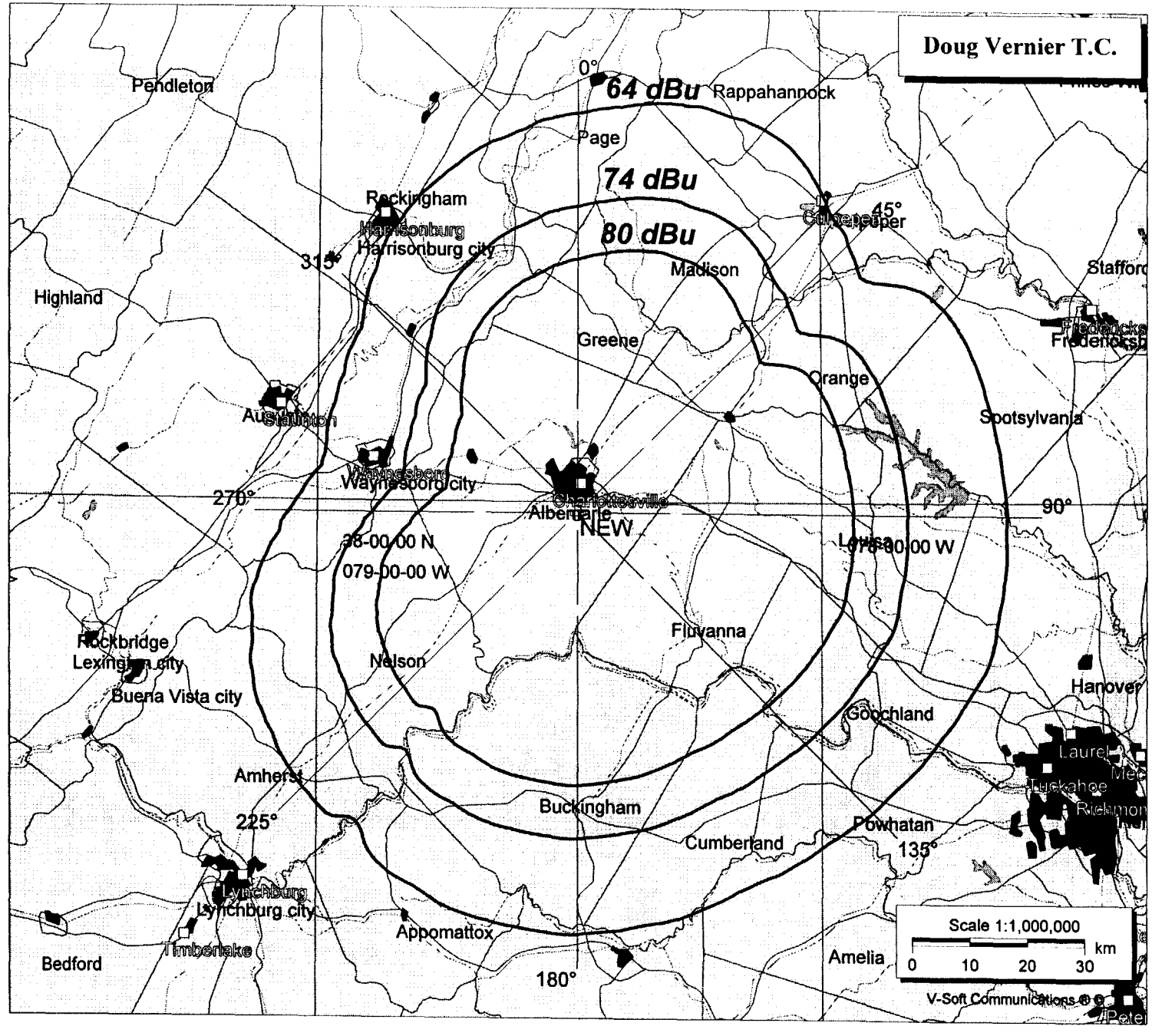


Exhibit #E6, Coverage

DOUG VERNIER TELECOMMUNICATIONS CONSULTANTS
1600 PICTURESQUE DR. CEDAR FALLS IA 50613

Ex #E7
Channel Study

Shenandoah Valley Educational TV Corp.
CH-19 Full Service

REFERENCE
37 58 59 N
78 29 02 W

DISPLAY DATES
DATA 11-10-99
SEARCH 11-10-99

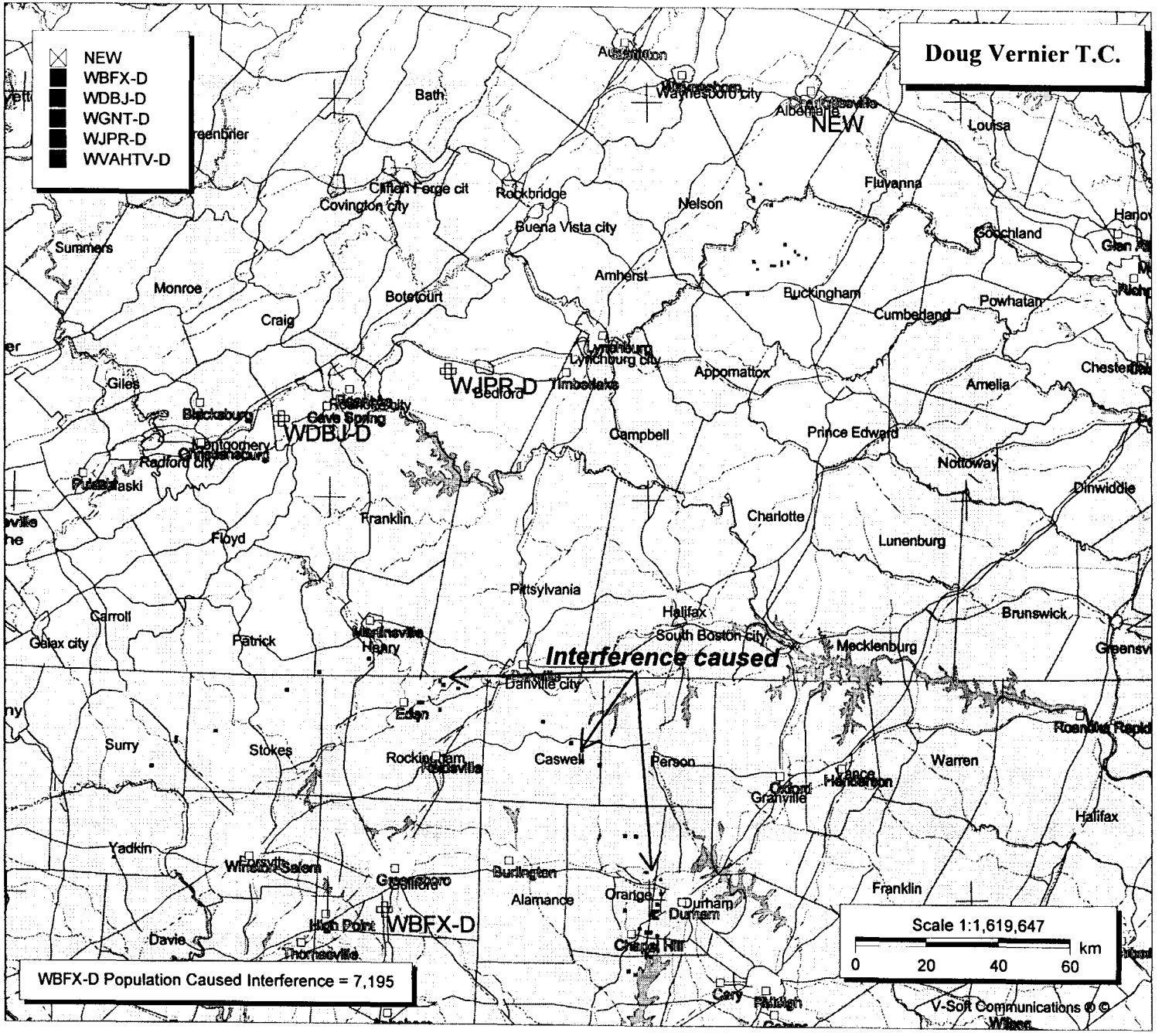
..... Channel 19-, 500 MHz .....

Call	Channel	Location		Dist	Azi		FCC	Margin
N. Lat.	W. Lng.		Power		HAAT			
WNPA	LI 19+	JEANNETTE	PA	250.96	346.7		> 248.60	2.36
40 10 51	79 09 46	DVY	3020.000 kW		325 M			
PARAMOUNT STATIONS GRP. OF			BLCT970813KF					
WGNT	ALD 19	PORTSMOUTH	VA	221.12	125.5		> 217.30	3.82
36 48 43	76 27 49	D	60.400 kW		296 M			
			BLCT2010					
WJPR	ALD 20	LYNCHBURG	VA	125.26	234.3	< 12.0	> 106.0	19.26
37 19 14	79 37 59	D	186.300 kW		500 M			
			BLCT930513KE					
WBFX	ALD 19	LEXINGTON	NC	253.38	208.4		> 217.30	36.08
35 58 09	79 49 29	D	84.500 kW		297 M			
			BLCT920424KE					
WCVETV	LI 23Z	RICHMOND	VA	93.65	123.7		> 031.40	62.25
37 30 46	77 36 06	VY	2950.000 kW		327 M			
CENTRAL VIRGINIA EDUCATION			BLET940816KE					
WDBJ	ALD 18	ROANOKE	VA	171.65	239.8	< 12.0	> 106.0	65.65
37 11 42	80 09 22	D	605.000 kW		610 M			
			BLCT2428					
WDBJ-D	AP 18	ROANOKE	VA	171.67	239.8	< 12.0	> 106.0	65.67
37 11 42	80 09 23	TY	460.000 kW		606 M			
WDBJ TV, INC.			BPCDT991012BJ					
WETATV	CP 26-	WASHINGTON	DC	162.26	47.3		> 095.70	66.56
38 57 49	77 06 18	VY	2290.000 kW		233 M			
GREATER WASH ED TELECOMM.			BPET890111KE					
WETATV	LI 26-	WASHINGTON	DC	162.26	47.3		> 095.70	66.56
38 57 49	77 06 18	VY	2290.000 kW		235 M			
GREATER WASH ED TELECOMM.			BLET438					
WDCA	AP 20+	WASHINGTON	DC	162.26	47.3		> 087.70	74.56
38 57 49	77 06 18	VY	5000.000 kW		233 M			
PARAMOUNT STATION GROUP OF			BPCT970106KG					
WDCA	LI 20+	WASHINGTON	DC	162.26	47.3		> 087.70	74.56
38 57 49	77 06 18	VY	3980.000 kW		235 M			
PARAMOUNT STATION GROUP OF			BLCT2091					

Outgoing Interference from Proposed Facility

NEW
Latitude: 37-58-59 N
Longitude: 078-29-02 W
Power: 904.00 kW
Frequency: 503.0 MHz
Channel: 19
AMSL Height: 502.55 m
Elevation: 422.163 m
Prop Model: Longley/Rice
Climate: Cont temperate
Conductivity: 0.0050
Dielec Const: 15.0
Refractivity: 301.0
Receiver Ht AG: 9.1 m
Time Variability: 10.0%
Sit. Variability: 50.0%
ITM Mode: Broadcast

WBFX-D
Latitude: 35-58-09 N
Longitude: 079-49-29 W
Power: 84.50 kW
Frequency: 503.0 MHz
Channel: 19
AMSL Height: 536 m
Elevation: 244.0 m
Prop Model: Longley/Rice
Climate: Cont temperate
Conductivity: 0.0050
Dielec Const: 15.0
Refractivity: 301.0
Receiver Ht AG: 9.1 m
Time Variability: 90.0%
Sit. Variability: 50.0%
ITM Mode: Broadcast



V-Soft Communications Interference Population Report

Stations which receive interference from New CH 19, 904 kW at 502.55 M COR:

Call Letters	H Units	Population	Area (sq. km)
WBFX-D	3606	7195	84.95
WJPR-D	37	78	17.42

Totals for NEW
Total population to which interference is caused: 7273
Total number of housing units to which interference is caused: 3643

	Housing Units	Population
North Carolina		
Caswell County		
WBFX-D	1	2
Chatham County		
WBFX-D	287	686
Durham County		
WBFX-D	2,083	3,988
Lee County		
WBFX-D	11	34
Orange County		
WBFX-D	651	1,136
Rockingham County		
WBFX-D	152	422
Stokes County		
WBFX-D	25	60
Surry County		
WBFX-D	257	524
Yadkin County		
WBFX-D	40	108

	Housing Units	Population
Virginia		
Albemarle County		
WJPR-D	4	8
Buckingham County		
WJPR-D	33	70
Henry County		
WBFX-D	99	235

EXHIBIT # E8

R.F. RADIATION COMPLIANCE STATEMENT
Channel 19 – 904 kW H DA
Shenandoah Valley Educational TV Corp

November 1999

Based on the formulas expressed in the OET Bulletin, No. 65, August 1997, "Evaluating Compliance with F.C.C. Guidelines for Human Exposure to Radiofrequency Electromagnetic Fields", published by the Federal Communication Commission's Office of Science and Engineering, the proposed facility is predicted to produce a maximum R.F. non-ionization radiation level at a position six feet above the tower base (head level - based on the C.O.R. of 75.5 meters minus 2 meters) of 34.71 microwatts per square centimeter. Since the applicant proposes a high gain UHF antenna, a vertical elevation field of .1 toward the nadir was used in this calculation. There area around the proposed tower is uncontrolled at the current time therefore 34.71 microwatts per square centimeter amounts to 10.35 percent of the maximum for the frequency in use of 335.34 microwatts per square centimeter.

TV station WHTJ shares the same tower. It transmits using 251 kW ERP from an antenna center of 86.3 meters above ground. Using the OET #65 formulas it can be shown that this station contributes a total of 7.316 microwatts per square centimeter at a point 2 meters above the ground. This is 1.79 percent of the maximum of 423.34 microwatts per square centimeter for an uncontrolled area.

Consequently, the total contribution from both stations is 12.14 percent of the maximum. The proposed tower is located at a short distance from another tower structure holding the antennas of several FM stations all operating with ERP's below .6 kW. There is also a 5,000 kW TV station within some 200 meters of the proposed antenna location, therefore the applicant will take measurements during is equipment testing period to insure that there will be no "hot spots" within the area at the base of its tower and between the other radiators. If "hot spots" areas are found where the Commission's maximum is exceeded the applicant will build a fence around its tower (and guy wires if necessary) to convert the area to "controlled" and to comply with the Commission's maximums.

The applicant will protect workers on the tower by either reducing ERP or terminating transmission. An agreement is in effect with the users at this location to reduce power or to terminate operations to protect workers from receiving in excess of the Commission's standard.

Consequently, it appears that the proposed FM station will be in full compliance with the Commission's human exposure to radiofrequency electromagnetic field rules and regulations.